

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

|                                                                                         |                                                   |
|-----------------------------------------------------------------------------------------|---------------------------------------------------|
| <b>IN RE: ETHICON, INC., PELVIC<br/>REPAIR SYSTEM PRODUCTS<br/>LIABILITY LITIGATION</b> | <b>Master File No. 2:12-MD-02327<br/>MDL 2327</b> |
| <b>THIS DOCUMENT RELATES TO:</b><br><br><b>Ethicon Wave 1 cases listed in Exhibit A</b> | <b>JOSEPH R. GOODWIN<br/>U.S. DISTRICT JUDGE</b>  |

**PLAINTIFFS' MOTION TO EXCLUDE THE GENERAL OPINIONS OF  
DEFENSE EXPERT CHRISTOPHER RAMSEY, M.D.**

COME NOW Plaintiffs to respectfully request that this Court exclude the opinions of Christopher Ramsey, M.D., because he is not qualified as an expert under Federal Rule of Evidence 702, and because he did not engage in a reliable methodology to reach his opinions, as required by the *Daubert* standard. The basis for the motion is set forth in the accompanying Memorandum in Support. The motion is supported by the following exhibits:

**Exhibit A:** List of cases on which Dr. Ramsey is designated

**Exhibit B:** Ramsey Deposition, April 6-7, 2016

**Exhibit C:** Ramsey CV

**Exhibit D:** Ethicon IFU chart for pelvic mesh products

**Exhibit E:** Updated Annotated IFU for TVT

**Exhibit F:** Hinoul Testimony, *Batiste v. McNabb*, No. DC-12-14350 (Tex. Dist. Ct. 95th Dist. March 26, 2014)

**Exhibit G:** Ramsey TVT Report

**Exhibit H:** FDA 522 Order, Jan. 3, 2012

**Exhibit I:** Smith Memo to several recipients, March 19, 2010, at ETH.MESH.06927249

**Exhibit J:** Neuman, et al., *Transobturator vs Single-Incision Suburethral Mini-slings for Treatment of Female Stress Urinary Incontinence: Early Postoperative Pain and 3-Year Follow-up*, J. OF MINIMALLY INVASIVE GYNECOLOGY, Nov.-Dec. 2011

**Exhibit K:** Haab, et al., *TVT Secur Single-Incision Sling After 5 Years of Follow-Up: The Promises Made and the Promises Broken*, EUROPEAN UROLOGY 62, 2012.

Dated: May 2, 2016

Respectfully submitted,

/s/Thomas P. Cartmell

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**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing document on May 2, 2016, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/Thomas P. Cartmell

**Attorney for Plaintiffs**